UNITED STATES DISTRICT COURT for the

District of Minnesota

UNITED STATES OF AMERICA

Case No. 25-mj-376 (JFD)

v.

VANCE LUTHER BOELTER
FILED UNDER SEAL PURSUANT TO
COURT ORDER

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT ONE

(Stalking of Melissa Hortman – Use of Interstate Facilities)

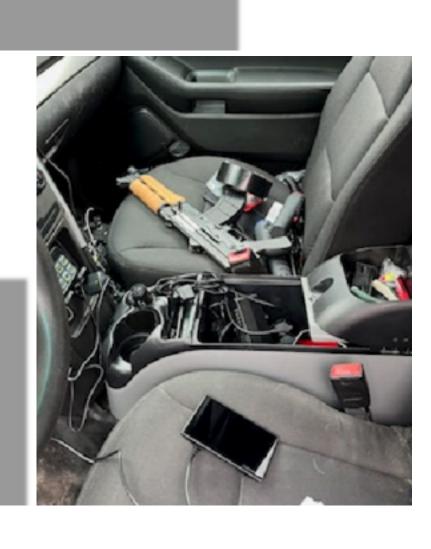
On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and a facility of interstate or foreign commerce, to engage in a course of conduct that placed that person in a reasonable fear of the death of and serious bodily injury to that person and that person's spouse, and in the course of engaging in such conduct caused the death of that person and that person's spouse, to wit, BOELTER used a GPS navigation system, interstate wires, and the Internet to plan and carry out the stalking, shooting, and killing of Melissa Hortman and Mark Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b)(1).

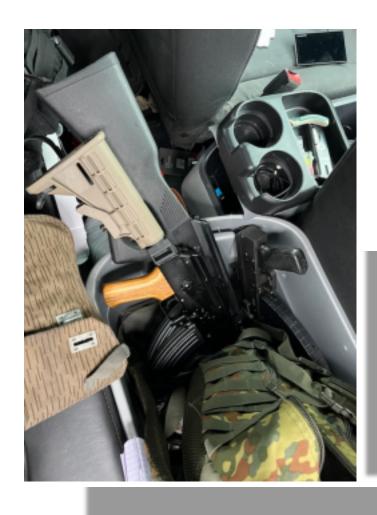
COUNT TWO

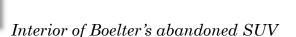
(Stalking of John Hoffman – Use of Interstate Facilities)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and a facility of interstate or foreign commerce, to engage in a course of conduct that placed that person in a reasonable

31. Officers also found approximately five firearms in the SUV, including semi-automatic, assault-style rifles, as well as a large quantity of ammunition organized into loaded magazines. They also found a medical kit containing wound treatment supplies and several eye masks of the kind that might be worn while sleeping.







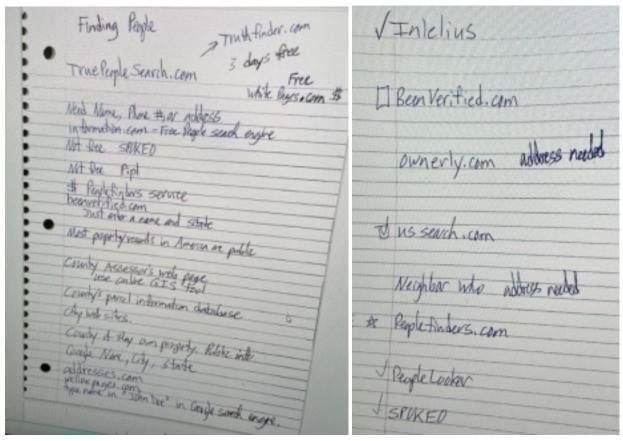
32. From the SUV, officers recovered several notebooks full of hand-written notes. Listed among the pages of those notebooks were the names of more than 45 Minnesota state and federal public officials, including Representative Hortman, whose home address was written next to her name.

11

33. One of those notebooks contained lists of internet-based people search engines including Truepeoplesearch, Spokeo, Pipl, Peoplefinders, Beenverified, Whitepages, Truthfinder, Intelius, Ownerly, USsearch, and Peoplelooker. I know

from my training and experience, and the training and experience of other officers and agents involved in this investigation, that these websites aggregate data from various online and offline sources to provide the querying user details about the searched-for person, such as home addresses, phone numbers, and information about

family members.



Pages from Boelter's notebook